

United States Court  
Southern District of Texas  
FILED  
Appendix A

APR 03 2017

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
Houston DIVISION

David J. Bradley, Clerk of Court

Lawrence Dickerson

versus

Kellogg Brown and Root

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§  
§  
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§  
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§

CIVIL ACTION NO.

17 CV 1018

EMPLOYMENT DISCRIMINATION COMPLAINT

1. This action is brought under Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is conferred by Title 42 United States Code, Section § 2000e-5.

2. The Plaintiff is:

Address:

County of Residence:

3. The defendant is:

Address:

☐ Check here if there are additional defendants. List them on a separate sheet of paper with their complete addresses. N/A

4. The plaintiff has attached to this complaint a copy of the charges filed on \_\_\_\_\_ with the Equal Opportunity Commission.

5. On the date of 04 Jan 17, the plaintiff received a Notice of Right to Sue letter issued by the Equal Employment Opportunity Commission; a copy is attached.

6. Because of the plaintiff's:

- (a) ☒ race
- (b) ☐ color
- (c) ☐ sex
- (d) ☐ religion
- (e) ☐ national origin,

the defendant has:

- (a) ☐ failed to employ the plaintiff
- (b) ☐ terminated the plaintiff's employment
- (c) ☐ failed to promote the plaintiff

(d) ☒ other: • Wrongfully terminated in Reduction in force

• Compensated at a significantly lower pay rate than caucasian counterparts

• Failed to take action when notified about

discrimination, • Promoted at a slower rate than

caucasian counterparts who graduated from non-HBCU's

7. When and how the defendant has discriminated against the plaintiff:

• Most recently the final 2-3 years of employment

• By dismissing claims of discrimination, Breaking confidential

trust, inconsistent claims of plaintiff's work performance, wrongful

termination in Reduction in force, Misleading info of Plaintiff's work performance to 3rd party

8. The plaintiff requests that the defendant be ordered:

- (a) ☐ to stop discriminating against the plaintiff
- (b) ☐ to employ the plaintiff
- (c) ☐ to re-employ the plaintiff
- (d) ☐ to promote the plaintiff

(e) ☒ to compensate the plaintiff for:

- years of lower pay rate versus caucasian counterparts
- wrongful termination via reduction in force
- pain & suffering

(e) ☐ to \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ and that;

(f) ☒ the Court grant other relief, including injunctions, damages, costs and attorney's fees.



(Signature of Plaintiff)

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